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18 Attorneys for Defendants  
19 COUNTY OF SANTA CRUZ

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21 UNITED STATES DISTRICT COURT  
22 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO

23 MARLENE HENDERSON, THE ESTATE OF  
24 EDYTH HENDERSON, and THE ESTATE  
25 OF JOSEPH HENDERSON,

26 Plaintiffs,

27 vs.

28 COUNTY OF SANTA CRUZ, THE SANTA  
29 CRUZ COUNTY SHERIFF'S  
30 DEPARTMENT, THE SANTA CRUZ  
31 COUNTY HEALTH SERVICES AGENCY,  
32 and DOES 1 THROUGH 25, INCLUSIVE,

Defendants

Case No.: 3:14-cv-03544 WHO  
(HRL)

**STIPULATION AND ORDER TO  
CONTINUE DEADLINE TO  
OPPOSE DEFENDANTS'  
MOTION FOR SUMMARY  
JUDGMENT AND TO AUGMENT  
THE BRIEFING SCHEDULE**

1  
2 TO THE HONORABLE COURT:

3 This stipulation is entered into by and between the plaintiffs and the defendants,  
4 by and through their respective counsel.

5 1. On February 19, 2020, Defendant filed a Motion for Summary Judgment.

6 [Doc.101] Plaintiff's response is due on or before March 4, 2020.

7 2. On March 20, 2020, the scheduling order was augmented [Doc.107] and  
8 the hearing was continued to July 17, 2020; Plaintiffs' Opposition is due on June 26,  
9 2020 and Defendant's Reply is due on July 3, 2020.

10 3. Since the COVID-19 quarantine, counsel for Plaintiff has experienced  
11 deaths of family and friends. As such, counsel have met and conferred and stipulated  
12 to a short continuance to allows Plaintiff's counsel to deal with personal issues and  
13 additional time to file Plaintiff's opposition.

14 4. The parties continue to engage in meaningful settlement dialogue.

15 5. Based on the foregoing, the parties seek to to extend the time for Plaintiff to  
16 respond to Defendants' Motion for Summary Judgment from June 26, 2020 to July 10,  
17 2020; and the time for Defendant to file their Reply Brief from July 3, 2020 to July 17,  
18 2020.

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6. The parties further seek to amend the current scheduling order to continue the deadline to hear Motions for Summary Judgment from July 17, 2020 to July 31, 2020 and to continue the hearing on Defendants' Motion for Summary Judgment accordingly.

NOW THEREFORE, IT IS HEREBY STIPULATED by the Parties, subject to approval by this Court, that the Scheduling Order be amended as follows:

Dated: June 25, 2020

## LAW OFFICES OF MICHAEL J. CURLS

By: \*/s/ Nichelle D. Jones  
Nichelle D. Jones  
Attorney For Plaintiff

Dated: June 25, 2020

HAAPALA, THOMPSON & ABERN, LLP

By: /s/ Jody Struck  
Jody Struck  
Attorneys for Defendant  
\*Ms. Struck provided her consent that this  
document be electronically filed

## **MODIFIED ORDER**

PER STIPULATION OF COUNSEL, as modified below, IT IS HEREBY  
ORDERED that the motion deadlines be revised as follows:

## **Deadline for Plaintiff to Respond**

## **to Defendants' Motion for Summary**

**Judgment:** **July 10, 2020**

## Deadline for Defendants to Reply to

## **Plaintiff's Opposition to Motion for Summary**

**Judgment:** **July 17, 2020**

## **Hearing on Defendants' Motion for**

**Summary Judgment:** August 19, 2020

DATED: June 25, 2020

W. H. D.

Judge of the United States District Court